

REMARKS

Claims 1, 2 and 4-7 are pending the application; All claims stand rejected. By this Amendment. These amendments add no new matter to the application,

Claims 1-2 and 4-7 stand rejected under 35 USC §102(e) as being anticipated by Dekelbaum; applicant respectfully traverses this rejection. Claim 1 requires a chat function that specifically has "browser leading" capabilities. "Browser leading" is defined in the specification as the "ability to drive one or more [client] browsers to desired locations on the web" (page 3, line 19-20) and/or as "The leader can quickly drive every participant's browser to any location on the web" (page 5, lines 24-25). Claim 1 thus requires a chat system wherein a user has the "ability to drive one or more browsers to desired locations on the web", not just some way of causing another browser to see a different web page, and this limitation is not met anywhere in the Dekelbaum reference.

The Dekelbaum technology is concerned primarily with "... supplying] information to a designated remote client on a data network in response to communications with the remote client on a communications network separate and distinct from the data network." Dekelbaum 5/22-25, and nowhere discusses a user computer "chatting" with another user and, inside that chat session, driving or leading that other user to some selected location on the web.

Dekelbaum's example of this is, "The operator terminal is connected to the server and includes (i) a display indicating the selected one of the pages of information transmitted to the client, i.e., an indication of the most recent information requested by the client, and (ii) a server controller for supplying address data to the server to cause it to transmit another selected one of the pages of information to the client on the first communications network while the operator terminal remains connected to the client on the second communications network. [emphasis added]" Dekelbaum 7/32-40. This example is typical of the reference, and actually teaches away from a chat based browser leading function, which takes place over a single communications

network in the claims, not two, as suggested by Dekelbaum. The text excerpts cited by the Examiner have been carefully reviewed in particular, and are not to the contrary.

For instance, the Examiner says that the reference discloses "browser leading" in the following cited passage:

According to one mode of operation of the system according to the invention, a caller uses a Web Browser 14a-14c to initiate access to the Internet via an Internet Access Provider 210. Once access is obtained, the user can "surf the net", or, if the URL of the Merchant's home page is known, go directly to that home page, i.e., initiate a connection with the Merchant's Internet Server 102 which responds by sending the client the specified resource. The resource in this case may be an HTML document as shown in FIG. 6. At the bottom of the page, enclosed in triangular brackets ("< >") in the figure, are hyperlinks 230 to automatically dial the Merchant Sales Facility 100. Dekelbaum 12/1-12.

But there is no mention in this passage of anything but ordinary web retrieval of HTML documents from a server; certainly no "browser leading" as defined above.

The Examiner also says that the reference discloses "browser leading" in the following cited passage:

The user tells the sales representative the session ID that has been returned. The operator then interrogates the data base of Internet Server 102 and brings up on the operator screen a window that contains a copy of the Home Page the user is viewing. The sales representative can now direct Internet Server 102 to "push" a different Home Page to the viewer. A copy of this Home Page is also displayed on the sales representative's Web Browser screen. Dekelbaum 15/17-25.

While here there is an explicit reference to "pushing" pages to a remote viewer, this is also not "browser leading" as defined above and in the current specification, because there is no chat context inside of which a change of the sales rep's web page then drives, or causes a corresponding change of, the user's web page.

Finally, the Examiner says that the reference discloses "chat service" in the following cited passage:

Clicking on the portion of the screen displaying the respective telephone numbers causes the Web Browser to request and retrieve a second resource from Internet Server 102 corresponding to the selected telephone number. The retrieved resource includes address information, i.e. the merchant's telephone number to be

dialed, and a MIME type associated with the autodialer command. Upon receipt of this data, the browser examines the MIME type, associates it with an autodialer functionality, launches the autodialer and passes the telephone number to be dialed to the autodialer.

The autodialer function may be part of a conventional terminal software utility or application written to a Hayes compatible Telephony Application Programming Interface (TAPI) standard for Microsoft Windows. Alternatively, the autodialer functionality may be included as an applet embedded within a merchant's web page. Thus, the HTML object supplied by Internet Server 102 incorporates not only the telephone number to be dialed, but the executable content required to perform the autodial and related functions. For example, the autodial applet may not only dial the Merchant Sales Facility 100 but, in response to establishment of the connection, automatically request and/or identify the session ID from/to ACD 106. The JAVA language may be used for such an applet with Web Browser 14 being JAVA or HotJAVA compatible." Dekelbaum 12/13-37

This is not "chat" as defined above and in the specification, because, among other things, this is all about telephony, and not at all about web chat.

Claim 2 requires, among other things, that the user be "connected via the hyperlink" in order to effect her "real-time dialogue" with a live sales or service person. "Connected via a hyperlink to effect a real-time dialogue" is common parlance in the industry for establishing and maintaining a certain kind of chat session. As explained above, Dekelbaum neither contemplates nor suggests starting a web chat session and then conducting business over that chat connection, much controlling, driving or leading anyone's web browser by means of the chat connection, as is required by Claims 2 and 7.

Claim 2 requires a communications process wherein a user is enabled to have a live chat session with a service person, simply by clicking on a button; and further wherein the service person leads (not sends) the user to a selected location on the web. The cited reference does not teach or suggest this claimed process; there is no mechanism for, and no discussion about, using a chat function to connect a user and a service person for answering questions or leading the user to a selected web site. The text excerpts cited by the Examiner have been carefully reviewed in particular, and are not to the contrary. Thus claims 1, 2 and 4-7 are distinguished over

Dekelbaum and are believed to be in condition for allowance; reconsideration is therefore requested.

Claims 1-2 and 4 stand rejected under 35 USC §102(e) as being anticipated by Tang; and claims 5-7 are rejected under 35 USC §103 over Tang in view of Anupam; applicant respectfully traverses this rejection. Again, Claim 1 requires a chat function that specifically has "browser leading" capabilities. Claim 1 thus requires a chat system wherein a user has the "ability to drive one or more browsers to desired locations on the web", not just some way of causing another browser to see a different web page, and this limitation is also not met anywhere in the Tang reference.

The Tang technology is concerned primarily with a notification system that two or more workers happen to be viewing the same page. When the system determines that these workers are on the same browser page it simply sets them as what Tang calls "task proximate," which creates a notification icon in their application. There is no discussion or suggestion of a first worker driving a second worker's browser to the same page that the first worker is viewing. Neither does Tang discuss using a chat with another worker in such a way that, inside that chat session, driving or leading that other worker to some selected location on the web is effected.

For instance, the Examiner says that the reference discloses "browser leading" in the following cited passage:

The application constraint may be relaxed so that workers viewing the same data with different applications, or application types, are still task proximate. Examples include viewing the same World Wide Web page with different web browsers, or accessing the same database table with different database applications. Tang 5/14-16.

But there is no mention in this passage of anything but two workers who happen to be viewing the same web page (no suggestion that one worker caused in any way the other worker's browser to go to that same web page); certainly no "browser leading" as defined above.

The Examiner also says that the reference discloses "browser leading" in the following cited passage:

At any time there may be a large variation in the number of workers who are task proximate to the current worker, as a consequence of the time of day, application base, network size, and other factors. Also, some applications are intended to involve large numbers of different users simultaneously, such as video broadcasting presentation software. In order to accommodate these variations, the user may control the appearance of the encounter window. There are preferably at least two different ways the encounter window 20 can appear when the encounter mechanism is open. For applications where it is anticipated or in fact there are a relatively small number of task proximate workers, the encounter window 20 displays the representations of these users in a compact window format. Tang 7/47-61.

This is also not "browser leading" as defined above and in the current specification, because there is no discussion or suggestion of control of one user's browser by another user, even though there is some mention of facilitating chat between the two users (but not for browser leading purposes).

Again Claim 2 requires, among other things, that the user be "connected via the hyperlink" in order to effect her "real-time dialogue" with a live sales or service person. As discussed above in connection with Claim 1, this means establishing and maintaining a certain kind of chat session in which one user can lead the other user's browser to any location on the web. As explained above, Tang neither contemplates nor suggests starting a web chat session and then control other users' browsers by means of the chat connection, as is required by Claims 2 and 7.

Claim 2 requires a communications process wherein a user is enabled to have a live chat session with a service person, simply by clicking on a button; and further wherein the service person leads (not sends) the user to a selected location on the web. The cited reference does not teach or suggest this claimed process; there is no mechanism for, and no discussion about, using a chat function to connect a user and a service person for answering questions or leading the user to any selected web site. The reference excerpts cited by the Examiner have been carefully

reviewed in particular, and are not to the contrary. Thus claim 2 and 4 are distinguished over Tang and are believed to be in condition for allowance; reconsideration is therefore requested.

Claims 5-6 and 7 implicitly incorporate all the limitations of Claims 1 and 2 respectively, and therefore are also distinguished over the Tang reference, regardless of what is disclosed in Anupam.¹ Since independent Claims 1 and 2 are believed to be distinguished and allowable over the cited art, so must also be dependent Claims 4-7.

Applicant believes that it has responded fully to all of the concerns expressed by the Examiner in the Office Action, and respectfully requests reexamination of all rejected claims and early favorable action on them. The Examiner is also respectfully requested to call Applicant's attorney Patrick Dwyer at (206) 550-4049 to arrange for an Interview as to these claims, prior to any action on them.

Respectfully submitted,



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¹ In any event, Applicant does not presently concede that Anupam discloses what the Examiner represents as disclosed.